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June 1, 2012

VIA ECF & U.S. MAIL

Hon. Claire C. Cecchi, U.S.D.J.
United States District Court
District of New Jersey
M.L. King, Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Illinois National Insurance Co. v. Wyndham Worldwide Operations, Inc., et al. Civil Action No. 09-1724

Dear Judge Cecchi:

This firm represents the Wyndham entities in the referenced matter. On May 29, 2012 plaintiff Illinois National Insurance Company ("Illinois National") filed a motion (see Doc. Nos. 159-161) asking Your Honor to reverse Magistrate Judge Arleo's May 14, 2012 Order and order Wyndham to produce documents over which it has asserted privilege. Currently, Wyndham's opposition brief is due June 18, 2012. I write to request an extension of that date, to July 2, 2012, because my associate (who has been handling the production and privilege issues with me) will be out of town (on his honeymoon) for the next two weeks. We also request that the due date for Illinois National's reply brief be July 17, 2012.

We have conferred with counsel for Illinois National, who has consented to this request. We thank the Court for its time and consideration.

Respectfully submitted,

Mighael David Lichtenstein

MDL:ej

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Enclosures

cc: Andrew T. Houghton, Esq. (via ECF)

Aaron Mandel, Esq. (via ECF) Eric Jesse, Esq. (via ECF)

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